

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Modification of Mail Classification  
Schedule for Global Express  
Guaranteed, Express Mail International,  
And Outbound Priority Mail International

Docket No. MC2012-9

PUBLIC REPRESENTATIVE COMMENTS  
ON POSTAL SERVICE NOTICE  
OF MINOR CLASSIFICATION CHANGES

(February 21, 2012)

The Public Representative hereby provides comments pursuant to Order No. 1228.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service notice concerning minor classification changes for the following competitive mail services: Global express Guaranteed (GXG), Express Mail International (EMI), and Outbound Priority Mail International (PMI).<sup>2</sup>

The Postal Service proposes to add the phrase “other approved software” to the Commercial Base pricing category description for GXG, EMI, and PMI. Notice at 1. Commercial Base customers of GXG, EMI, and PMI currently have the option of using Postal Service-supplied software. The Postal Service states that the addition of this phrase would give such customers “the option of using either Postal Service-supplied or Postal Service-approved software to prepare and pay for” their Commercial Base shipments. Id.

The second change would add the phrase “that electronically transmits data” and the word “vendor” to the Commercial Base price category description for PMI. Id. at 2. Currently, the Commercial Base price category for GXG and EMI require the electronic transmission of custom-related functions either online at USPS.com, or by using an

---

<sup>1</sup> PRC Order No. 1187, Notice and Order Concerning Classification Change, February 14, 2012.

<sup>2</sup> Notice of the United States Postal Service of Minor Classification Change, February 10, 2012 (Notice).

authorized PC Postage vendor. Id. According to the Postal Service, this change “renders the ‘Commercial Base’ price category descriptions for GXG, EMI, and PMI parallel in structure as already codified in the International Mail Manual (IMM).” Id.

The Public Representative considers these classification changes to be truly minor in nature and appropriate for notice pursuant to 39 C.F.R. §§ 3020.90 and 3020.91. Sections 3020.90 and 3020.91 permit the Postal Service to initiate changes to the Mail Classification Schedule (MCS) that do not constitute a proposal to modify either the market dominant or competitive product list. 39 C.F.R. § 3020.91.

The Public Representative respectfully submits the foregoing comments for the Commission’s consideration.

---

James F. Callow  
Public Representative

901 New York Ave. NW  
Washington, DC 20268-0001  
202-789-6839  
callowjf@prc.gov